

# EXHIBIT 2

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

**DECLARATION OF M.A.**

M.A., pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is M.A., I am under 18 years of age and I am fully competent to make this Declaration.
2. I am half Pacific Islander, one-quarter black, and one-quarter white.
3. I am in the 10<sup>th</sup> grade at a public high school in the Inland Empire area of Southern California. More than two-thirds of the students at my school qualify for a free or reduced lunch. The majority of the students at my school are Latino, but we have significant racial diversity. One of the things that bothers me about my

school is the frequent use of the n\*\*\*\* word. I also do not like the frequent fighting that happens at my school.

4. I often feel like people at my school do not understand what it means to be Pacific Islander. For example, we have a Polynesian dance club at our school, but it is not even taught by a Polynesian teacher, the participants wear Tahitian (not Polynesian) outfits, and the music is not even Polynesian music. I feel like it is offensive to call the club a “Polynesian Dance Club,” when there is nothing Polynesian about it. In addition, people at my school also often assume that I am related to the Tongan football players that used to go to my school, even though I am not even Tongan; they do not even realize that Samoans have vastly different culture and experiences than Tongans or Native Hawaiians. We are not all related.
5. I am currently taking one AP class: AP Euro History. I could not take any AP classes as a freshman because none were offered. I intend to also take AP Biology, AP US History, AP Government, AP Economics, AP Spanish, AP Statistics, AP Calculus, AP English Language Composition, AP English Literature and Composition, and AP Psychology.
6. I love to play soccer. As a freshman, I started on the varsity soccer team every year. I also play Club Soccer and serve as the Captain of my team.
7. In addition to soccer, I am a staff writer for our school newspaper, a member of the Make-A-Wish club and a member of the Gay Straight Alliance.
8. I am not entirely sure, but I think I would like to eventually become either a lawyer, a forensic psychologist, or a cultural anthropologist.

9. When I apply for college, I will apply to Harvard College. I want to go to a school known for creating graduates who are the best in their field. I also want to go to a private school because I like smaller learning environments. Diversity is very important to me. All of my friends are people of color and I would feel very isolated if I went to a school without the diversity to which I have become accustomed. As a biracial person, it is particularly important for me to be surrounded by many different types of people.
10. I also think that I have a lot to contribute because of my Pacific Islander and biracial identity. Many people do not understand the history, culture, and (im)migration experiences of Pacific Islanders and the differences between different Pacific Islander groups. As a biracial person, I have had to confront my racial identity in many complex ways already. For example, people at my school tell me that they are scared of me because they are scared of black people, but I primarily identify as Pacific Islander rather than black. My sibling did not realize until well into elementary school that he was not purely Pacific Islander, despite the fact that he saw that our grandmother was white and our grandfather was black. I already can see that race is constructed and I can bring that important perspective to the college classroom and dorm room.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, December 11, 2016.

M.A.